

**REMARKS**

The present amendment is responsive to the Office Action mailed in the above-referenced case on May 20, 1999 made final. In the Office Action claims 1-13 are presented for examination. Claims 1-5 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kubler et al (USP 5,726,984) hereinafter Kubler, in view of Chin (USP 5,825,775) hereinafter Chin, and further in view of Anderson (USP 5,757,904) hereinafter Anderson. Claims 11-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kubler in view of Otto, and Anderson. Further claims 6-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kubler in view of Otto and further in view of Arango (USP 5,732,078) hereinafter Arango and Anderson.

Applicant has studied the prior art provided by the Examiner in detail, and the Examiner's remarks in rejection of the claims. In response, the applicant has Applicant has herein canceled some claims and amended some of claims standing for examination to more particularly point out and distinctly claim the subject matter regarded as the invention, and to distinguish unarguably over the references cited and applied.

Claim 6 as amended herein recites:

*6. An Internet Protocol Network Telephony (IPNT) call-routing system for routing incoming IPNT calls to at least one agent workstation in an IPNT-capable call center, comprising:*

*an initial call-processing system receiving IPNT calls from customers over a wide area network (WAN), and including a Service Control Point (SCP) processor routing the incoming IPNT calls to selected agent addresses at the at least one call center;*

*characterized in that the SCP processor uses activity information, including one or more of call volume, agent status, and agent skills, received from the at least one call center to select the agent addresses at agent workstations in the at least one call center to route the incoming IPNT calls.*

The Examiner has rejected claim 6 under 103(a) using Kubler in view of Otto, Arango and Anderson. The Examiner states that Kubler provides a call center (Internet providers 6333) or 63105 system comprising a first processor connected to a WAN and a second processor also connected to the WAN. The first processor adapted to receive and distribute IPNT calls.

Applicant has amended claim 6 to specifically limit the processor in the initial processing system to a Service Control Point (SCP) processor in the network capable of routing incoming IPNT calls from customers to individual agents at computer workstations at at least one IPNT call center. Kubler, nor any of the other art presented by the Examiner teaches a processor at an initial processing level in a WAN, like the Internet, capable of the functions as claimed in applicant's invention.

The processors in Kubler, referenced by the Examiner, are limited to forwarding calls between the PSTN and internet destinations and vice versa. Kubler does not teach intelligent processors having the capability of routing IPNT calls based on status of a remote destination. Kubler teaches only the conventional servers known in the art, capable of forwarding IPNT calls by conventional switching techniques.

Applicant claims a SCP processor receiving an IPNT call, receiving information about possible agent destinations for the call, and routing the call to the best-fit agent based on the received information, thereby substituting a new IPNT address for the call.

The Examiner states that Otto teaches an initial call center A, which selects destinations based on information about transactions at remote call centers B,C and D. Otto's processor 15 is a management information system providing information about the load applied to and the service provided by call center A MIS's for ACD's are well known in the art. The administrator 16 then uses the information to control parameters i.e. load max limits etc. (col. 5 lines 43-51).

More specifically when the system of Otto receives a call at a switch for serving an ACD, test 203 is used to determine whether the delay in processing the call equals or exceeds a predetermined parameter. If not, then the call is placed in the main queue. Otto's processor 15 may access information from ACD's but cannot affect the routing decisions based on the activity information received. The parameter may be altered by the administrator based on the information received from the MIS 15. Otto does not teach the activity information being gathered at the agent level as in claim 1.

Further applicant does not believe it would be obvious for a person skilled in the art to apply a conventional telephone or PSTN network based invention to a system for receiving IPNT calls and successfully routing the calls to agents at remote IPNT call centers. IPNT networks and PSTN networks have radically different physical architectures. For example IPNT networks do not have ACD switches etc. IPNT networks are conventionally known as "dumb networks" in the art. Data packets have a designated address for the recipient at the time of origination. IPNT calls are merely forwarded between servers in the "dumb network." Typically the final address must be decided when the call is placed. Applicant's invention brings intelligent routing capabilities to the art of routing data packets on the internet that was unknown at the time of applicant's filing of this invention.

The Examiner states that Kubler does not teach a processor in the call center that routes calls to individual ones of computer platforms. The Examiner uses the art of Arango to teach an access point/IP provider that comprises a processor which routes calls to individual ones of computer platforms (routers 13 & 14 in Fig. 1, or 224 & 226 in Figure 6).

Applicant's claim 6 specifically discloses the SCP processor uses activity information, including one of call volume, agent status, and agent skills, received from the at least one call center to select destinations at agent workstations in the at least one call center to route the incoming IPNT calls. Arango's processors 13, 14, 224, and 226 are router/servers in Arango's system for forwarding calls over the WAN or guaranteed bandwidth network. The destinations, or computer platforms, in Arango are clearly not agent workstation destinations in a call center as claimed. In the art of Arango it is clear that destination addresses are not altered by the routers/processors as in applicant's invention. The destination remains the same, only the network in which the calls are sent is switched. Arango does not teach the sort of intelligent call routing disclosed in applicant's claimed invention.

The prior art presented in the art has failed to support the claimed system of routing IPNT calls to selected agent workstation destinations in an IPNT call center based on agent level status of the call center. The art presented by the Examiner fails to support the 103 rejection regarding claim 6 as amended. Applicant believes claim 6 is patentable over the prior art cited and applied. Claims 7-10 are also patentable at least as depended from a patentable claim.

Claim 11 as amended now recites:

*11. An Internet Protocol Network Telephony (IPNT) call processing system for routing incoming calls to at least one agent workstation in an IPNT-capable call center, comprising:*

*an Internet routing server adapted to route IPNT calls; and*

*a database connected to the Internet routing server receiving and storing processed information about transactions including at least one of call volume, agent status, or agent skills at the remote IPNT call center;*

*wherein the Internet routing server is adapted to select final destinations for the incoming calls based on the stored processed information about transactions at the remote IPNT call centers.*


Claim 11 is rejected by the Examiner under 103 over Kubler in view of Otto and Anderson. The Examiner states that Otto teaches that a call center selects a destination for routing calls based on information about transactions at remote call centers, where the call centers do not have too many calls in a queue. The Examiner also states Otto teaches a MIS 15 (database) at the call center for collecting, processing and sending information regarding loads of the call center to other MIS' in other call centers. As argued above, column 5 of Otto clearly states that information provided by the MIS' are monitored by sending data packages periodically. A system administrator accesses the data from the MIS and controls the parameter 13 based on the information provided by the MIS. The MIS is not sending information to a database connected to an Internet server adapted for receiving and storing processed information about transactions at remote IPNT call centers, wherein, the Internet routing server is adapted to select final destinations at the operator workstation computer platforms based on the stored processed information about transactions at the remote IPNT call centers. **The administrator only sets parameters, not routing individual calls.**

Applicant respectfully requests that Otto be withdrawn as applied to the 103 rejection, as the applicant has successfully shown that Otto fails to support the rejection as applied to claim 11 and as argued on behalf of claim 6 above. As argued Claim 12 is now patentable at least as depended from a patentable claim.

As all of the claims as amended are clearly shown to be patentable over the art of record, Applicant respectfully requests that the rejections be withdrawn and that the case be passed quickly to issue.

If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Respectfully Submitted,  
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